

To: Galbraith, Michael[Galbraith.Michael@epa.gov]
From: Lee, Jae
Sent: Wed 4/19/2017 1:42:51 PM
Subject: RE: Tradebe Status State draft RCRA permit

That is my understanding for the federal side.

But I will check with State whether they also have same appeal process.

Jae

From: Galbraith, Michael
Sent: Wednesday, April 19, 2017 8:41 AM
To: Lee, Jae <lee.jae@epa.gov>
Subject: RE: Tradebe Status State draft RCRA permit

Thanks jae - pls let us know if you hear if IDEM subsequently receives ETC comments via mail.

I can't remember the exact rules on RCRA permit appeals, but I assume that if ETC does not comment on the permit, then they cannot challenge the final permit decision. Is that your understanding?

Mike Galbraith
 Permits Branch (5303P)
 Program Implementation/Information Division
 Office of Resource Conservation and Recovery
 U.S. Environmental Protection Agency
 1200 Pennsylvania Avenue, NW
 Washington, DC 20460

(703) 605-0567

From: Lee, Jae
Sent: Wednesday, April 19, 2017 9:34 AM
To: Galbraith, Michael <Galbraith.Michael@epa.gov>
Cc: Setnicar, Mary <Setnicar.Mary@epa.gov>; Valentino, Michael <Valentino.Michael@epa.gov>; rjean@idem.in.gov; Victorine, Gary <victorine.gary@epa.gov>; John Naddy <jnaddy@idem.in.gov>
Subject: Tradebe Status State draft RCRA permit

Mike G.,

It seems ETC has not submitted a review comment of the State RCRA draft permit renewal for Tradebe issued on March 3, 2017. The public comment period ended on March 17, 2017. We might need to wait several more days to make sure of the submittal of ETC's comments. We will inform you soon if ETC ever submitted comment for the IDEM draft RCRA permit.

The IDEM is planning to issue a final RCRA permit within approximately 4 to 6 weeks.

Jae

From: JEAN, RUTH [mailto:RJEAN@idem.IN.gov]
Sent: Wednesday, April 19, 2017 5:17 AM
To: Lee, Jae <lee.jae@epa.gov>
Subject: RE: Tradebe Status

I have not received any comments. If I do, you will see the comments when I respond to them with the issuance of the final decision in approximately 4-6 weeks.

From: Lee, Jae [mailto:lee.jae@epa.gov]
Sent: Tuesday, April 18, 2017 10:41 AM
To: JEAN, RUTH <RJEAN@idem.IN.gov>

Subject: RE: Tradebe Status

Ruth,

I guess the public comment period for the RCRA draft permit for Tradebe is ended.

Was ETC submitted any comments for the draft permit? If they did, can you share with us?

Jae

From: JEAN, RUTH [<mailto:RJEAN@idem.IN.gov>]

Sent: Wednesday, April 12, 2017 10:34 AM

To: Lee, Jae <lee.jae@epa.gov>

Subject: RE: Tradebe Status

No

From: Lee, Jae [<mailto:lee.jae@epa.gov>]

Sent: Wednesday, April 12, 2017 11:30 AM

To: JEAN, RUTH <RJEAN@idem.IN.gov>

Subject: RE: Tradebe Status

Ruth

Has the Environmental Technology Council submitted review comments for the State RCRA draft permit for Tradebe?

Jae

From: Lee, Jae

Sent: Monday, April 10, 2017 10:43 AM

To: 'JEAN, RUTH' <RJEAN@idem.IN.gov>

Cc: John Naddy <jnaddy@idem.in.gov>; Setnicar, Mary <setnicar.mary@epa.gov>; SCHROER, CRAIG <CSCHROER@idem.IN.gov>;
Valentino, Michael <valentino.michael@epa.gov>

Subject: Tradebe Status

Ruth,

I would like to let you know that we received response (mostly CBI) for the information request of the Desorption Units from Tradebe.

We have a meeting scheduled with Tradebe's representatives on April 12 at Chicago to discuss mass balance aspects of the units.

We are also scheduled a conference call with HQ and Region 6 on April 17.

If things are moving well, we might able to send a memo to HQ of the Region 5's position on this permit exemption issue by the end of April or early May.

Please let me know if you have any questions.

Jae

From: JEAN, RUTH [<mailto:RJEAN@idem.IN.gov>]

Sent: Tuesday, February 07, 2017 11:26 AM

To: Lee, Jae <lee.jae@epa.gov>

Cc: Valentino, Michael <Valentino.Michael@epa.gov>; John Naddy <jnaddy@idem.in.gov>; Setnicar, Mary
<Setnicar.Mary@epa.gov>

Subject: RE: Tradebe waste derived fuel issue

Jae,

As I've informed you before, any questions related to the SDS decision should be directed to John Naddy.

When you called earlier, you asked if Tradebe generates HW fuels from their fuel blending operations, and who utilizes those fuels. For clarification, my answers were in relation to their permitted fuel blending operations only. I want to ensure that you did not think I was discussing the SDS unit.

For future reference, please understand that I cannot answer any questions regarding the SDS units. I am not familiar with the SDS, nor was I involved in the original decision. I can only answer questions regarding their hazardous waste permit.

Thanks,

Ruth

From: Lee, Jae [<mailto:lee.jae@epa.gov>]
Sent: Tuesday, February 07, 2017 11:33 AM
To: JEAN, RUTH
Cc: Valentino, Michael
Subject: Tradebe waste derived fuel issue

Ruth,

HQ came up a question that the IDEM's March 31, 2006 letter (attached) states that, in the second page, fifth paragraph, "If the unit was used to produce fuels or merely for treatment, the unit would require a HW treatment permit".

Since Tradebe generates hazardous waste derived fuels for the blending to send to off-site cement kilns, should they be required to have a treatment permit?

Any thoughts on this? This letter was referenced in the CAA permit.

Jae